

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X		Index No. 07 Civ. 00032(JS)(WDW)
ILSA MACHINE CORP. d/b/a)	
COLUMBIA DRY CLEANING)	
MACHINES,)	
)	
Plaintiff,)	
)	
-against-)	Declaration of Steven A. Morelli in
)	Opposition to Defendants' Motion for
)	Summary Judgment
SATEC (U.S.A.), LLC,)	
CLEANERS FAMILY, and ABRAHAM)	
CHO, Individually and in His Official)	
Capacity,)	
)	
Defendants.)	
-----X		

STEVEN A. MORELLI, an attorney duly admitted to practice law in the Eastern District of New York, declares the following to be true under penalty of perjury:

1. I am a member of The Law Office of Steven A. Morelli, P.C., attorneys of record for the Plaintiff in the above captioned matter, and as such I am fully familiar with the facts and circumstances set forth herein by virtue of the file maintained by this office.
2. I submit this Declaration on behalf of the Plaintiff in opposition to Defendants' motion for summary judgment and to identify certain exhibits Plaintiff intends to use to oppose said motion.
3. Annexed hereto as Exhibit 1 is a copy of Plaintiff's verified Amended Complaint, with

Exhibits A-B attached thereto. Plaintiff's Amended Complaint was verified by Stephen Langiulli, Plaintiff's Executive Vice President, on April 18, 2008.

4. Annexed hereto as Exhibit 2 is a copy of Defendants' Answer to Amended Complaint.
5. Annexed hereto as Exhibit 3 is a copy of Defendant Cleaners Family's responses to Plaintiff's interrogatories.
6. Annexed hereto as Exhibit 4 is a copy of Defendant Satec (U.S.A.) LLC's responses to Plaintiff's interrogatories.
7. Annexed hereto as Exhibit 5 is a copy of Plaintiff's response to Defendants' interrogatories, sworn to by Stephen Langiulli on January 16, 2009.
8. Annexed hereto as Exhibit 6 is a copy of the transcript of the deposition of J.C. Choe (Jung Chull Choe), which was taken on December 17, 2008, and a copy of the transcript of the continued deposition of J.C. Choe, which was taken on May 19, 2009.
9. Annexed hereto as Exhibit 7 is a copy of the transcript of the deposition of Defendant Abraham Cho, which was taken on June 12, 2009.
10. Annexed hereto as Exhibit 8 is a copy of the transcript of the deposition of Stephen

Langiulli, as the Rule 30(b)(6) witness for Plaintiff, which was taken on May 20, 2009.

11. Annexed hereto as Exhibit 9 are copies of a number of used checks of Defendant Satec (USA) LLC, which were produced by the Defendants as part of their responses to Plaintiff's demand for documents.
12. Annexed hereto as Exhibit 10 is a copy of a "Certificate of Trade Name" with respect to Defendant Cleaners Family, sworn to by Abraham Cho and Esther Cho on September 13, 2002.
13. Annexed hereto as Exhibit 11 is a copy of the Declaration of Stephen Langiulli in Opposition to Defendants' Motion to Dismiss and in Support of Plaintiff's Cross-Motion to Amend its Pleadings, and Exhibits 1-14 attached thereto, dated June 7, 2007.
14. Annexed hereto as Exhibit 12 is a copy of the Declaration of Jung Chull Choe in Support of Defendants' Notice of Motion to Dismiss the Complaint, dated April 25, 2007.
15. Annexed hereto as Exhibit 13 is a copy of the Declaration of Man Soo Roh dated June 17, 2009.
16. Annexed hereto as Exhibit 14 is a copy of the Declaration of Stephen Langiulli in Opposition to Defendants' Motion for Summary Judgment dated October 19, 2009.

17. I declare under penalty of perjury that the foregoing is true and correct.

Dated: Carle Place, New York
October 19, 2009

/s/
Steven A. Morelli (SM 4721)